

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

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Caption in Compliance with D.N.J. LBR 9004-1(b)

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Attorney for the Debtor(s)

By: Justin M. Gillman, Esq.

In Re:

Jovanny Valdez

Case No.: 19-16636

Judge: MBK

Chapter: 13

CHAPTER 13 DEBTOR'S CERTIFICATION IN OPPOSITION

The debtor in this case opposes the following (**choose one**):

1. ☐ Motion for Relief from the Automatic Stay filed by _____ ,
creditor,

A hearing has been scheduled for _____ , at _____ .

☒ Motion to Dismiss filed by the Chapter 13 Trustee.

A hearing has been scheduled for October 11, 2023 , at 9:00 AM .

☐ Certification of Default filed by _____ ,

I am requesting a hearing be scheduled on this matter.

2. I oppose the above matter for the following reasons (**choose one**):

☐ Payments have been made in the amount of \$ _____ , but have not
been accounted for. Documentation in support is attached.

☒ Payments have not been made for the following reasons and debtor proposes

repayment as follows (**explain your answer**):

After resolving Motion for Relief and filing Modified Plan to treat post-petition arrears through Plan, Debtor was offered trial loan modification. Debtor has completed trial plan payments and filing Modified Plan to treat secured creditor outside Plan.

☒ Other (**explain your answer**):

Debtor to make immediate payments based on remaining claims to be paid through Plan.

3. This certification is being made in an effort to resolve the issues raised in the certification of default or motion.
4. I certify under penalty of perjury that the above is true.

Date: 10/2/2023

/s/ Jovanny Valdez
Debtor's Signature

Date: _____

Debtor's Signature

NOTES:

1. Under D.N.J. LBR 4001-1(b)(1), this form must be filed with the court and served on the Chapter 13 Trustee and creditor, if applicable not later than 7 days before the date of the hearing if filed in opposition to a Motion for Relief from the Automatic Stay or Chapter 13 Trustee's Motion to Dismiss.
2. Under D.N.J. 4001-1 (b)(2), this form must be filed with the court and served on the Chapter 13 Trustee and creditor, if applicable not later than 14 days after the filing of a Certification of Default.